

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA,

v.

JOHN GRISHAM (1)
ROB WILBURN (2)

Defendants.

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Case Number: 3:21-CR-00440-M

ORDER

Before the Court are the Government's Unopposed Motion for Disclosure of Grand Jury 502(d) Order (ECF No. 71) and Motion for Disclosure of Grand Jury Materials (ECF No. 74).

The Motions are **GRANTED**.

Also before the Court is the Government's Filter Team's Motion for Entry of an Agreed Further Order Pursuant to Federal Rule of Evidence 502(d) ("Filter Team Motion"). ECF No. 72. The Filter Team Motion is **GRANTED** as follows.

1. The Government Filter Team is authorized to release to Defendants John Grisham and Rob Wilburn the ten reports of interviews referenced in the Filter Team Motion (the "Protected Documents").

2. This Order, and the Government's disclosure of the Protected Documents, shall not constitute or cause a waiver or forfeiture of any claim of attorney-client privilege or work product protection in any federal or state proceeding. *See* Fed. R. Evid. 502(d).

3. In the event the Government seeks to withhold or limit the use of the Protected Documents at a future point on the basis of the attorney-client privilege, the attorney work


product protection, or any other privilege or protection over any materials produced pursuant to this Order, Defendants Grisham and Wilburn has the right to contest those assertions at that time.

4. The Court will resolve all disputed privilege and work product protection matters and potential uses of such material. For any document or communication that is deemed privileged by the Court or for which no objection to a privilege claim is made, Defendants shall return, sequester, or destroy any existing copies of the document or communication consistent with Federal Rule of Civil Procedure 26(b)(5)(B). If it is not technically feasible to return, sequester, or destroy the privileged documents or communications during the litigation, Defendants shall not review the privileged documents or communications, or use them for any purpose and shall destroy or return to the privilege holder all copies of the privileged documents or communications as soon as this matter has concluded.

5. The Protected Documents covered by this Order shall be subject to the Court's November 10, 2021, Protective Order (ECF Nos. 26, 114).

SO ORDERED.

April 13, 2023.


BARBARA M. G. LYNN
UNITED STATES DISTRICT JUDGE